MAR 2 0 2000

Rafter Seven Ranch
2757Horseshoe Lk Rd.
Chewelah, WA 99109
March 17, 2000

U.S. Army Corps of Engineers, Walla Walla District
Attention: Lower Snake River Study
201 North Third Avenue
Walla Walla, WA 99362-1876

Dear Decision Makers

Thank you for the opportunity to comment on proposed Salmon management. There are so many studies on the table at the present time I hope these comments are appropriate for your study. Our family supports Alternative 3 that provides for maximum barge and truck transport of juvenile salmon around all dams in the lower Snake and Columbia River system.

We also want the following additional actions to be taken by the Federal agencies responsible for them.

1. The Corps of Engineers should be required to remove the top of the dredge spoil manufactured "Rice Island" to below the normal low water level in the river. This spoil and any future dredge material should be transported to the Washington side of the Mouth of the Columbia river and deposited on shore where there has been an erosion of the beach because the historic river silt flow has been cutoff by the dams.

2. Alternative 3 would eliminate the need for the John Day Drawdown study.

3. National Marine Fisheries Service should be required to follow the provisions of my "Salmon Management in the Columbia River Basin" attachment to this letter.

4. All agencies involved with the listing and management of threatened salmonids must fully comply with the Regulatory Flexibility Act, 5 U.S.C. Section 601, et seq. (1994) (as amended by Public law 104-121, Title II, 110 Stat. 864-67 (1996)).

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Sincerely yours
Bob Playfair
Managing Family Farm and Forest Steward
VP Washington Farm Forestry Association
VP Stevens County Farm Bureau

A NEED FOR CHANGE

An open letter to all Federal Agencies conducting
SALMON MANAGEMENT IN THE COLUMBIA RIVER BASIN

Submitted by Bob Playfair Rafter Seven Ranch 2757 Horseshoe Lk Rd Chewelah WA 99109
3-15-2000 VP Washington Farm Forestry Association
VP Stevens County Farm Bureau

The following is based on a lifetime of study and making a living managing natural resource based ecosystems in Washington, Idaho and Montana. I started out cutting wood with a crosscut saw, shocking hay and grain, and milking cows by hand. My parents saw fit to continue my education in Ag, Forestry and Wildlife management.

In the late 1950's the farm would not support two families. I spent the next 20 years managing, protecting and enhancing natural resources on federal trust lands. During that time the Family's forestlands started to look like the sick National Forest across the fence. In the last 15 years with aggressive management we have been able to revitalize the health of several hundred acres. We now have a healthier, more productive forest that is also providing prime wildlife habitat and vegetative cover.

In 50 years of managing living organisms, including people, I have learned they all look a lot like their mothers and fathers. Small parents produce small siblings and large parents produce robust offspring. This is a concept the NMFS has not addressed in their proposed listing of the Columbia River and Pacific coast Salmon.

The salmon restoration programs published to date are all predicated on enhancing spawning habitat. All of the pristine fresh water habitat in the world has no value without enough adult salmon possessing the size and strength to swim up the river and spawn a sufficient number of eggs to fully populate the available habitat. Anyone who has had the privilege of standing belly deep in freezing water in November taking salmon spawn knows the largest females produce twice as many, and bigger eggs, than a fish only one third smaller.

The National Marine Fisheries, being a branch of the Department of Commerce has done a great job of accomplishing it's mission over the past 50 years. Infact they have out done themselves when setting Ocean seasons and catch limits. The commercial fishing vessels and processing plants have been profitable and the consuming public has enjoyed all the salmon they can eat at an affordable price.

This NMFS efficiency has suddenly placed all of us who own and manage the inland terrestrial habitat that provides the clean water for the Salmon in an impossible position. We are now expected to immediately set aside and modify our streamside habitat to protect the eggs and smolts produced by the few dwarf salmon that have escaped the nets and are able to return to their home stream and spawn.

At times, I wonder what University today's Fisheries biologists graduated from. Historically, nature provided the largest fish for the toughest job. It takes a lot of body fat to negotiate 600+ miles of Celilo and kettle falls studded streams without eating. Also, big fish provide more and larger eggs, which grow healthier baby salmon for the trip down the rivers. The spawning salmon returning today are the small ones who have been able to swim through the gill nets or were not big enough to make the Select grade in the ocean harvest market.

A successful American farmer today does not use dwarf brood stock to produce the succulent food you eat. Cattlemen buy the best breeding stock they can find and wheat growers use certified seeds. If the goal is to bring back fully stocked Salmon runs, then the NMFS ocean harvest program of selectively returning fewer smaller adult salmon to their home river must be drastically modified.

The only way to create a salmon population that will fill the available habitat is for the NMFS to close all ocean fishing in US waters and get the Canadians to do the same. Then move the harvest of adult salmon to the mouth of each spawning river. Only after enough fish to fight over the available spawning areas have passed the counting station will fishermen be allowed to harvest half of the remaining migrants, taking only the smallest fish. As soon as the river runs are re-built and the fisheries scientists can identify those populations that are not in trouble, then some targeted ocean fishing seasons can again be opened.

I have only had time to wade through part of the Corps of Engineers forty -some thousand pages of the dam removal EIS they provided on CD. Most of the ecological data presented seems to be based on the NMFS PATH concept, which is nothing but computerized theoretical science models based on someone's belief, not hard data from scientific field research.

Most of my fellow farmers who own and manage the stream banks in the Columbia River basin would be happy to provide more and better spawning habitat if they were provided the following. First, establish an improved-habitat rental program. Second, provide a cost shared Habitat Enhancement incentives program. Third, a **SAFE HARBOR** assurance program must be established to protect all farmers who actively manage and enhance stream sides and upland drainage areas from public law suits and ESA 4d incidental take.

This approach, will ultimately cost the public fewer tax dollars and greatly increase salmon production when a Habitat Enhancement Incentives program replaces the published mandatory set-a-sides of wide unmanaged streamside zones. Working with landowners will accomplish faster and more complete habitat recovery. Mandated non-economically productive use of private land will force many farmland owners to convert these now marginally productive areas to sub-divisions. This forced change of use will ultimately defeat the desired environmental goal of maintaining large tracts of uninhabited open space producing clean water and enhanced wildlife habitats.

The bottom line is:

1) Just send us a few more than we need of the biggest and best adult salmon for spawning.
2) Provide an incentive-based cost share program.
3) Protect our habitat enhancement efforts from lawsuits.

With the above incentives and protections, north west farmers will produce all the baby salmon you need to fill the now well protected and actively managed river mouth, estuary and ocean fishery.

Yes, there will be a severe reorganization for fishing families. Just like our timber industry has already weathered over the past 10 years with the spotted owl fiasco. The program I have outlined will produce the best of both worlds. We will save the cost of Dam Breaching, retain the farm and barging economy and continue to enjoy the premium benefits of the electrical power now generated, without burning fossil fuels.